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REMARKS

Claims 1-7 and 10-24 are in the present application. Claims 8 and 9 are canceled and claims 1-7 and 10-24 remain unchanged from the originally filed claims, as indicated in the amendments submitted herewith.

Claims 1, 10 ,15, and 20-24 were rejected under 35 USC 102(a) as being anticipated by Guck. Respectfully, this rejection is traversed.

Applicant's arguments of record are incorporated herein.

Applicant discloses and claims a method, a computer, and a memory media for composing a computer message (see claims 1, 10, 15, 20, 21, and 23). For example, the claimed method of claim 1 comprises "presenting a message composition area for entry of an unformatted message" (emphasis added). Claims 10, 15, and 20 recited similar wording. The method of claim 21 states receiving an unformatted message from a user. The memory media of claim 23 comprises means for controlling the computer to receive as unformatted message from a user. Clearly, the method, computer, and memory media of Applicant's claims present or receive an unformatted message.

Regarding the rejection of independent claims 1, 10, 15, 20, 21, and 23, the Office Action cites and relies upon Guck for allegedly disclosing the claimed presenting a message composition area for entry of an unformatted message. However, Guck actually appears to disclose a multiple transport and dynamic format converter for a content server that converts a file of one format to a second format and/or protocol for reception and processing by a device or application. It is further noted that Guck discloses a methodology wherein the

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message provided for reformatting is initially provided as formatted. That is, the message composer provides the message formatted in a first format, and the message is reformatted into a second format. This is contrary to Applicant's claimed method, computer, and memory media where an unformatted message is presented or received.

In the citation of col. 2, ln. 1-19 in the background section of Guck, there is only disclosed a supposed problem with the "[H]eretofore" art. Guck does not disclose a message composition area for unformatted text. Guck discloses at the cited and relied upon col. 6, ln. 10-28 "that the user will author or originate 'source' information in one particular format designated for various recipients but that the recipients use different documents protocols for their appliances and/or completely different protocols." Clearly, Guck discloses "source" information authored or originated having a format. Guck also discloses at cited col. 12 that the provided Converter can satisfy a wide range of conversion needs to convert a document into a large number of possible formats. There is no disclosure of Applicants' claimed a message composition area for unformatted text.

Referring to the disclosure of col. 12, ln. 56-65, it is clear that Guck discloses creation of a word document and making the document available in "alternate formats", that is, available in a format other than the format in which the document was originally formatted. Contrary to the Office Action's characterization of Guck, Guck clearly discloses converting a formatted file from one format to another format.

Furthermore, it is noted that Guck discloses converting a document or source data from one format to another format and/or protocol. There is no disclosure (or even apparent appreciation or consideration) of presenting a message composition area for unformatted text. That is, Guck does not disclose

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(or suggest) a message presentation area, let alone a message presentation area for unformatted text. Guck appears to disclose converting a document of a particular format to another format and/or protocol.

Guck does not even appear to be concerned with or appreciate Applicant's problem of alleviating the message composer from the burden of preparing a formatted computer message. This is the case since Shell present hypermedia content (i.e., formatted) and Guck converts from one format to another format.

Therefore, Applicant respectfully submits that the Guck does not disclose each and every element, configured as claimed by Applicant. Accordingly, it is respectfully submitted that Guck fails to anticipate independent claims 1, 10, 15, 20, 21, and 23 under 35 USC 102(a) for at least the reasons stated above. It is respectfully submitted that dependent claims 22 and 24 are also patentable for the reasons stated above regarding claims 21 and 23. Reconsideration and allowance of claims 1, 10, 15, 20-24 is respectfully requested.

Claims 2-7, 11-14, and 16-19 were rejected under 35 USC 103(a) as being unpatentable over Guck as applied to claims 1, 10, 15, and 20-24 in view of Ferrel et al. (hereinafter, Ferrel). This rejection is traversed.

As discussed above regarding the rejection of claims 1, 10, 15, and 20-24, Guck fails to disclose that for which it was cited and relied upon. Again, Guck fails to disclose or suggest (at least) presenting a message composition area for entry of an unformatted message, as claimed by Applicant. Accordingly, the combination of Guck with Ferrel as a basis for rejecting claims 2-7, 11-14, and

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16-19 as asserted by the Office Action does not support a rejection of the claims under 35 USC 103(a).

Claims 2-7 depend from claim 1; claims 11-14 depend from claim 10; claims 16-19 depend from claim 15; claim 22 depends from claim 21; and claim 24 depends from claim 23. It is respectfully submitted that each of the defendant claims are patentable over Guck and Ferrel for at least the reasons stated above regarding claims 1, 10, 15, 20-24. Accordingly, reconsideration and allowance of claims 2-7, 11-14, 16-19, 22, and claim 24 are requested.

Therefore, it is respectfully submitted that claims 1-7 and 10-24 are patentable over the cited and relied upon references. The allowance of claims 1-7 and 10-24 is earnestly solicited.

Respectfully submitted,

Dated: 6-10-04



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